

**Amendments to the Drawings:**

Please formally enter the accompanying Replacement Sheet directed to Fig. 1 of the drawings, which includes changes of a minor formal correcting nature (see Appendix B). Specifically, the located lower one of the duplicate reference numerals "34" in Fig. 1 of the drawings was accordingly corrected to reference numeral 35 thereby obviating the related objection made to the drawings in the outstanding Office Action. Also, the located lower ones of reference numerals "64" and "65" were revised to reference numerals 64' and 65', respectively, so as to avoid the inadvertent duplication of the similar numbers which relate to the transmission and the drive shaft of the automobile, respectively, in Fig. 1 of the drawings.

## **REMARKS**

Reconsideration and allowance of the above-identified application, as currently amendment, is respectfully requested.

The original Specification was revised to correct discovered informalities therein and, also, in consideration of effecting a number of clarifications therein. The Substitute Specification along with a marked-up version thereof are enclosed herewith as Appendix A. It is submitted, new matter is not being added with regard to the Substitute Specification, either by addition and/or deletion.

With regard to the accompanying Substitute Specification, a number of revisions therein were made concerning the matters raised with regard to the outstanding objection to the specification. For example, concerning the use of the term "grounding" in the expression "prevented from grounding", such as used in the second paragraph of page 4 of the original Specification as well as elsewhere in the Specification, it is intended to relate to ground fault, which is an alternative state of the art expression. The alternative expression ground fault was parenthetically inserted in this paragraph as well as in several other locations of the original Specification for purposes of clarification. Regarding the objection to the phrase "grounding preventive member other than a wire-coating", in the second paragraph of page 4 of the original Specification [paragraph 0010 of the Substitute Specification], this is intended to refer to a member, which is not a wire-coating, for preventing a ground fault. For purposes of enhancing the clarity thereof, this intended meaning was clarified with the parenthetical insertion of the expression covered by a member, which is not a wire-coating for preventing a ground fault.

Regarding the question of description support in the specification for reference numeral 35 in Fig. 1 of the drawings, this has now been rectified with the above-discussed change made to Fig. 1 of the drawings. Regarding the now revised reference numerals 64' and 65' in Fig. 1 of the drawings, corresponding changes have been implemented, also, in the Specification. Regarding the objection raised concerning the second paragraph of page 9 of the original Specification (paragraph [0026] of the Substitute Specification), the following brief explanation related thereto is being provided. The engine 62 drives the generator 6 and the front wheels 2fl, 2fr. The generator 6 generates an electrical power and a braking torque, i.e., a resistance torque of the generator when the generator is driven by the front wheels, reversely (regeneration braking torque). The control device 16 controls the generator 6 (electric power generation and braking torque), the engine 62 (driving torque) and the clutch 63 in response to amount of stepping on the brake pedal and the acceleration pedal and an operating state of the vehicle.

Regarding the objection to the noted descriptive expression on page 12, the third paragraph thereof, of the original Specification (paragraph [0031] of the Substitute Specification), a clarification directed thereto was effected therein in connection with the current amendments being made to the specification.

It is also submitted, the referred to first full sentence on page 16 of the original Specification (paragraph [0039] of the Substitute Specification) is a complete sentence, as is now amended. Regarding its description, it should be noted that the generator 6 is driven by the wheels and that electric power is generated. In this occasion, a resistance torque of the generator is used to brake the wheels and the electric power becomes charged in the battery 5.

Regarding the objected to term "insulate", such as used on page 19, the second paragraph thereof and, also, on page 20, the first paragraph thereof, of the original Specification, the expression "...to insulate and separate" was amended to the expression "...to separate". This change was effected in several additional locations of the specification.

It is submitted, in view of the formal remedial revisions implemented in the specification and Fig. 1 of the drawings, together with the above discussion, matters raised with regard to the outstanding objections to the specification and drawings have been overcome. Therefore, reconsideration as well as withdrawal of these objections is respectfully requested.

By the above-made amendments, also, original claims 1-6 were replaced with new claims 7-26. The newly presented claims are, likewise, directed to a power-supply unit for automobiles and, more specifically, to an electric-power supply unit for automobiles, consistent with that inferred by the original claim language. Noting the previously standing objections to the originally submitted claims, Applicants have carefully drafted the present claims so as to avoid any and all previously rendered concerns regarding the original claims. With the canceling of original claims 1-6, the previously standing rejections under 35 U.S.C. §112, first and second paragraphs, as well as the art rejections under 35 U.S.C. §102(a) and §103(a) were rendered moot.

It is submitted, the invention according to newly presented independent claims 7 and 18 and, also, with regard to the corresponding dependent claims thereof, was neither taught nor would have been suggested by Baumgartner

(US 2002/0158511 A1) or Shi (US 5,654,859) nor, for that matter, even in view of their combined teachings.

According to base claim 7, for example, the invention is an electric power-supply unit for automobiles comprising:

- An electric power-supply unit for automobiles comprising:
  - an electrically driven brake device for generating braking forces by being electrically driven;
  - an electric generator for generating an electric power and a braking force accompanied with the electric power generation;
  - an electric power storage device for storing the electric power generated by the electric generator;
  - a first electric power supply line electrically connecting the electric generator and the electric power storage device;
  - a first connecting device, provided on the first electric power supply line, for connecting and disconnecting electric connection between the electric power generator and the electric power storage device through the first electric power supply line;
  - a second electric power supply line electrically connecting the electrically driven brake device to the first electric power supply line at a first location between the electric power generator and the first connecting device and at a second location between the electric power storage device and the first connecting device;
  - a second connecting device, provided on the second electric power supply line between the second location and the electrically driven brake device, for connecting and disconnecting electric connection between the first electric power supply line and the electrically driven brake device through the second electric power supply line; and
  - a third connecting device, provided on the second electric power supply line between the first location and the electrically driven brake device, for connecting and disconnecting electric connection between the first electric power supply line and the electrically driven brake device through the second electric power supply line.

Further details regarding the electric power-supply unit which ensures sufficient braking forces, even in the case where abnormality occurs in the power-supply unit of the electrically-driven brake devices, are covered by the dependent claims thereof, and, also are explained in detail in connection with the disclosed example embodiments thereof, such as Fig. 1 of the drawings (see also the flowchart

operation thereof in Fig. 2), although not limited thereto.

With regard to the Example in Fig. 1 of the drawings, the set forth "electrically driven brake device" is featured with regard to the electrically-driven calipers 1fl-1fr and 1rl-1rr, drivers 4fl-4fr and 4rl-4rr and the electrically-driven brake control device 14. With regard to the example embodiment in Fig. 1 of the drawings, also, reference numerals 30 and 33 relate to the set forth "first electric power supply line" and the set forth "second electric power supply line", the power supply connection devices 21-23 relate to the set forth first through third connecting devices while junctions 41 and 42 relate to the set forth "first location" and "second location". In accordance with this scheme, the first, second and third connecting devices perform electric connection and disconnection of respective power supply lines independently from one another, consistent with that described in connection with the operation of the Fig. 1 example embodiment. The invention according to newly presented independent claim 18 also covers such a scheme and, further, it at least also calls for an electric power source control device for controlling the first through third connecting devices. An example thereof, although not limited thereto, can be seen with regard to the operative relationship between the power source connecting devices 21, 22 and 23 and the power-source control device 15.

Various other operative relationships with regard to achieving sufficient braking forces, such as during occurrence of abnormality in electric-power supply unit or with regard to the electrically-driven brake device, are achievable in connection with the schemed invention according to claims 7+ and 18+ including in manner clearly defining even over the combined teachings of Baumgartner and Shi, which were cited in the previously standing rejections.

Regarding the invention set forth in independent claims 7 and 18, and further according to the corresponding dependent claims thereof, the electric power-supply unit is structured to at least include first and second electric power supply lines and first, second and third connecting devices. An example of this can be seen with regard to the structure and operational relationship between the first and second supply lines 30 and 33 and the power source connection devices 21, 22 and 23. Their interrelationship, both during a normal operation as well as during occurrences of abnormality, is discussed beginning on page 11 of the original Specification, regarding related Fig. 1 of the drawings, and with regard to the operational flowchart shown in Fig. 2, discussion thereof is found beginning on page 19 of the original Specification. It is submitted, such a schemed structure of an electric power-supply unit for automobiles was neither disclosed nor would have been suggested even over the combined teachings of Baumgartner and Shi.

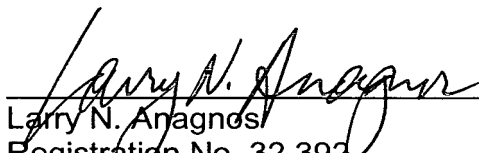
Neither Baumgartner nor Shi disclosed or suggested a schemed construction calling for first and second electric power supply lines and first, second and third connection devices as now set forth according to independent claims 17 and 18 and, also, according to the corresponding dependent claims thereof. For example, Baumgartner taught a scheme which employs a pair of electronic brake controllers (i.e. 10 and 12) in connection with a schemed construction that is clearly different than that required by the present invention (see paragraphs [0010] and [0011] regarding Fig. 1 and paragraph [0012] etc. regarding Fig. 2 of Baumgartner). It is submitted also, even if one of ordinary skill would have carefully considered the combined teachings of Baumgartner and Shi, the invention according to claims 7+ and 19+ still could not have been achievable.

Therefore, in view of the above-made amendments, together with these accompanying remarks, reconsideration as well as favorable action of the currently pending claims and an early formal notification of allowance of the above-identified application is respectfully requested.

To the extent necessary, Applicants petition for an extension of time under 37 C.F.R. §1.136. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account No. 01-2135 (500.42988X00) and please credit any excess fees to such Deposit Account.

Respectfully submitted,

ANTONELLI, TERRY, STOUT & KRAUS, LLP

  
\_\_\_\_\_  
Larry N. Anagnos  
Registration No. 32,392  
(703) 312-6600

Attachments

LNA:dlh/mlh